

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 06-102M-MPT
	:	
GERRI KNOTTS	:	
	:	
Defendant.	:	

**MOTION FOR CONTINUANCE OF SENTENCING**

Defendant, Gerri Knotts, by and through her undersigned counsel, Eleni Kousoulis, hereby moves the Court for an order continuing the sentencing hearing in this case. In support of the motion, the defense submits as follows:

1. Ms. Knotts is currently scheduled for sentencing on February 14, 2007 at 9:00 a.m.
2. Additional time is needed in which to prepare the Presentence Report in this case.

In order to complete the Presentence Report, certain medical and psychological records pertaining to Ms. Knotts are needed and have not yet been received. The defense is working jointly with probation in an effort to obtain the needed records.

3. A thirty (30) day continuance of sentencing is respectfully requested.
4. AUSA Dave Hall does not oppose this request for a continuance.

WHEREFORE, the defense respectfully requests that the Court continue the sentencing hearing in this matter for 30 days.

Respectfully Submitted,

/s/  
\_\_\_\_\_  
Eleni Kousoulis, Esquire  
Assistant Federal Public Defender  
704 King Street, Suite 110  
Wilmington, Delaware 19801  
Attorney for Defendant Gerri Knotts

DATED: January 4, 2007

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FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
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Plaintiff,	:	
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	:	
GERRI KNOTTS,	:	
	:	
Defendant.	:	

**CERTIFICATE OF SERVICE**

The undersigned attorney for defendant Gerri Knotts hereby certifies that a copy of Defendant's Motion for Continuance of Sentencing is available for public viewing and downloading and was electronically delivered on January 4, 2007, to:

Dave Hall, Esquire  
Assistant U.S. Attorney  
1007 Orange Street  
Suite 700, P.O. Box 2046  
Wilmington, DE 19899-2046

The undersigned attorney further certifies that on January 4, 2007, a copy of the attached Motion for Continuance of Sentencing was placed in a box in the United States District Court of the District of Delaware addressed to the following person:

Martin Durkin  
U. S. Probation Officer  
Suite 400, 824 Market Street  
Wilmington, DE 19801-3588

/s/ \_\_\_\_\_  
Eleni Kousoulis, Esquire  
Assistant Federal Public Defender  
704 King Street, Suite 110  
Wilmington, Delaware 19801  
Attorney for Defendant Gerri Knotts

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GERRI KNOTTS,	:	
	:	
Defendant.	:	

**ORDER**

In response to Ms. Gerri Knotts' Motion for Continuance of Sentencing, this Court HEREBY  
ORDERS on this \_\_\_\_\_ day of \_\_\_\_\_, 2007, that Defendant's sentencing hearing be  
re-scheduled for the \_\_\_\_\_ day of \_\_\_\_\_, 2007 at \_\_\_\_\_ a.m./p.m.

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The Honorable Mary Pat Thyng  
United States Magistrate Judge